

FILED 24 APR '13 12:17 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

3:13-cr-00182-BR
Case No: _____

v.

INDICTMENT

DEBRA SCHMIDT,

**Title 18 U.S.C. § 641
(Theft of Government Funds)**

Defendant.

**Title 18 U.S.C. § 981(a)(1)(C)
Title 28 U.S.C. § 2461(c)
(Forfeiture Allegation)**

THE GRAND JURY CHARGES:

COUNT 1

[Theft of Government Funds]

In or between August 2009 and continuing through July 2012, within the District of Oregon, **DEBRA SCHMIDT**, defendant herein, did knowingly and willfully steal and convert to her own use, money of the Social Security Administration, a department and agency of the United States, to wit: by receiving benefits in the approximate amount of \$49,233.00, based on fraudulent representations and concealments, all in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in count one of this Indictment, **DEBRA SCHMIDT**, defendant herein, shall forfeit to the United States, pursuant to 18 United States Code, Section 981(a)(1)(C) and 28 United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said violation.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

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- (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.


Dated this 23rd day of April, 2013.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL, OSB #953473
United States Attorney
District of Oregon



HELEN L. COOPER, OSB #871957
Special Assistant United States Attorney